Case 1-15-01185-cec Doc 2 Filed 11/05/15 Entered 11/05/15 16:35:27

Hearing Date: <u>December 2, 2015</u> Time: 3:30 p.m.

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UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

In re

HYPNOTIC TAXI LLC, et al., 1

Debtors

CITIBANK, N.A.,

Plaintiff,

- against -

BOMBSHELL TAXI LLC, et al.,

Defendants

Case No.: 15-43300 (CEC) (Jointly Administered)

Adv. Proc. No. 15-01185

## Notice of Motion for Abstention Pursuant to 28 USC § 1334(c) or, Alternatively, Remand Pursuant to 28 USC § 1452(b)

The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Hypnotic Taxi LLC (6632)(Case No. 15-43300); (ii) Bombshell Taxi LLC (1282)(Case No. 15-43301); (iii) Bourbon Taxi LLC (7155)(Case No. 15-43302); (iv) Butterfly Taxi LLC (6992)(Case No. 15-43303); (v) Candy Apple Taxi LLC (0249)(Case No. 15-43304); (vi) Chianti Taxi, LLC (6799)(Case No. 15-43305); (vii) Chopard Taxi Inc. (0746)(Case No. 15-43306); (viii) Cupcake Taxi LLC (0324)(Case No. 15-43307); (ix) Dorit Transit Inc. (9129)(Case No. 15-43308); (x) France Taxi LLC, (9592)(Case No. 15-43309); (xi) Hennessey Taxi Inc. (4039)(Case No. 15-43310); (xii) Iceberg Taxi Inc. (5877)(Case No. 15-43311); (xiii) Marseille Taxi LLC (9890)(Case No. 15-43312); (xiv) Merlot Taxi LLC (7103)(Case No. 15-43313); (xv) Milkyway Cab Corp. (5061)(Case No 15-43314); (xvi) Palermo Taxi, Inc. (5956)(Case No. 15-43315); (xvii) Pinot Noir Taxi LLC (6725)(Case No. 15-43316); (xviii) Pointer Taxi LLC, (2323)(Case No. 15-43317); (xix) Pudding Taxi Inc. (0432)(Case No. 15-43318); (xx) Stoli Taxi Inc. (4079)(Case No. 15-43319); (xxi) Vodka Taxi LLC (4239)(Case No. 15-43320); and (xxii) VSOP Taxi Inc. (3909)(Case No. 1543321)

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PLEASE TAKE NOTICE that a hearing on the motion (the "Motion") of Citibank, N.A. ("Citibank") for abstention pursuant to 28 U.S.C. §1334(c) or, alternatively, remand pursuant to 28 U.S.C. §1452(b) will be held on **December 2, 2015, at 3:30 p.m.** before the Honorable Carla E. Craig, Chief United States Bankruptcy Judge, at a hearing to be held at the United States Bankruptcy Court, Eastern District of New York, 271-C Cadman Plaza East, Brooklyn, New York 11201 (the "Hearing").

PLEASE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be: (a) filed by ECF with the Clerk of the Court and (b) served upon the undersigned counsel at the address set forth below, so as to actually be received **no later** than 4:00 p.m. on November 25, 2015 (the "Objection Deadline").

Dated: New York, New York November 5, 2015

ZEICHNER ELLMAN & KRAUSE LLP

By:

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